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7 Attorneys for Defendants, Counterclaimants, and
8 Third Party Plaintiffs PCJV USA, LLC, PCI
9 TRADING LLC, POTATO CORNER, LA
10 GROUP, LLC, GK CAPITAL GROUP, LLC,
11 NKM CAPITAL GROUP, LLC and GUY
12 KOREN, and Defendants J & K AMERICANA,
13 LLC, J&K LAKEWOOD, LLC, J&K
14 OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J
15 & K ONTARIO, LLC, J&K PC TRUCKS, LLC,
16 HLK MILPITAS, LLC, and GK CERRITOS, LLC

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 SHAKEY'S PIZZA ASIA VENTURES,
17 INC, a Philippines corporation,

18 Plaintiff,

19 vs.

20 PCJV USA, LLC, a Delaware limited
21 liability company; PCI TRADING , LLC, a
22 Delaware limited liability company; GUY
23 KOREN, an individual; POTATO CORNER
24 LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
25 LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
26 limited liability company; J&K
27 LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
28 LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

**JOINT REPORT IN RESPONSE
TO COURT ORDER, DKT. NO.
208**

Complaint Filed: May 31, 2024
Trial Date: August 18, 2025

1 GK CAPITAL GROUP, LLC, a California
2 limited liability company and DOES 1
3 through 100, inclusive,
4 Defendants.

5 PCJV USA, LLC, a Delaware limited
6 liability company; PCI TRADING LLC, a
7 Delaware limited liability company;
8 POTATO CORNER LA GROUP LLC, a
9 California limited liability company; GK
10 CAPITAL GROUP, LLC, a California
11 limited liability company; NKM CAPITAL
12 GROUP LLC, a California limited liability
13 company; and GUY KOREN, an individual,

14 Counter-Claimants,

15 v.

16 SHAKEY'S PIZZA ASIA VENTURES,
17 INC, a Philippines corporation,

18 Counter Defendant.

19 PCJV USA, LLC, a Delaware limited
20 liability company; PCI TRADING LLC, a
21 Delaware limited liability company;
22 POTATO CORNER LA GROUP LLC, a
23 California limited liability company; GK
24 CAPITAL GROUP, LLC, a California
25 limited liability company; NKM CAPITAL
26 GROUP LLC, a California limited liability
27 company; and GUY KOREN, an individual,

28 Third Party Plaintiffs,

v.

29 PC INTERNATIONAL PTE LTD., a
30 Singapore business entity; SPAVI
31 INTERNATIONAL USA, INC., a California
32 corporation; CINCO CORPORATION, a
33 Philippines corporation; and ROES 1 through
34 10, inclusive,

35 Third Party Defendants.

1 **JOINT REPORT IN RESPONSE TO COURT ORDER, DKT. NO. 208**

2 On Thursday, July 3, 2025, counsel for the parties, Michael D. Murphy,
3 Matthew Follett, Todd Malynn, Arash Beral, and Jamison Gilmore, conferred via
4 videoconference. The PCJV USA Parties reported that they oppose further delay,
5 oppose the recommended relief (*i.e.*, a trial continuance and reopening discovery) in
6 the Report and Recommendation (“R&R”) (Dkt No. 204), and intend to assert
7 objections to the R&R consistent with the July 1, 2025 Order (Dkt. No. 208) so that
8 their motion for sanctions (and the remedies sought therein) is reviewed *de novo* by
9 the District Court. SPAVI intends to respond to those objections by July 9, 2025 as
10 per the expedited schedule set forth in the July 1, 2025 Order.

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1 DATED: July 7, 2025

FOX ROTHSCHILD LLP

2 By: /s/ Michael D. Murphy

3 Michael D. Murphy
4 Matthew Follett
5 Jordan Zolliecoffer
6 Attorneys for Plaintiff and Counterclaim
7 Defendant SHAKEY'S
PIZZA ASIA VENTURES, INC., and
Third-Party Defendants SPAVI
INTERNATIONAL, US, INC., CINCO
COROPROATION; and PC
INTERNATIONAL PTE, LTD.

8 DATED: July 7, 2025

BLANK ROME LLP

9 By: /s/ Todd M. Malynn

10 Todd M. Malynn
11 Arash Beral
12 Jamison T. Gilmore
13 Attorneys for Defendants, Counterclaimants,
14 and Third Party Plaintiffs PCJV USA, LLC,
15 PCI TRADING LLC, POTATO CORNER,
16 LA GROUP, LLC, GK CAPITAL GROUP,
17 LLC, NKM CAPITAL GROUP, LLC and
18 GUY KOREN, and Defendants J & K
19 AMERICANA, LLC, J&K LAKEWOOD,
20 LLC, J&K OAKRIDGE, LLC, J&K
21 VALLEY FAIR, LLC, J & K ONTARIO,
22 LLC, J&K PC TRUCKS, LLC, HLK
23 MILPITAS, LLC, and GK CERRITOS,
24 LLC

ATTESTATION OF E-FILED SIGNATURE

Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I, Todd M. Malynn, hereby attest that I have obtained concurrence in the filing of this document from the other signatories to this document. I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

DATED: July 7, 2025

BLANK ROME LLP

By: *Todd M. Malynn*

Todd M. Malynn

Todd M. Mac
Arash Beral

Khush Behar
Jamison T. Gilmore

Attorneys for Defendants, Counterclaimants, and Third Party Plaintiffs PCJV USA, LLC, PCI TRADING LLC, POTATO CORNER, LA GROUP, LLC, GK CAPITAL GROUP, LLC, NKM CAPITAL GROUP, LLC and GUY KOREN, and Defendants J & K AMERICANA, LLC, J&K LAKEWOOD, LLC, J&K OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J & K ONTARIO, LLC, J&K PC TRUCKS, LLC, HLK MILPITAS, LLC, and GK CERRITOS, LLC

CERTIFICATE OF SERVICE

1
2 The undersigned certifies that on July 7, 2025, the foregoing document was
3 electronically filed with the Clerk of the Court for the United States District Court,
4 Central District of California, using the Court's Electronic Case Filing (ECF)
5 system. I further certify that all participants in the case are registered CM/ECF
6 users and that service will be accomplished by the CM/ECF system.
7

8 I certify under penalty of perjury that the foregoing is true and correct.
9 Executed on July 7, 2025.

10 By: /s/AJ Cruickshank
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